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[Case No. 2:24-cv-01441-RSL] - 1

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JAIME RAMON CASTANEDA VALENZUELA,

Plaintiff,

v.

CONNIE NOLAN, et al.,

Defendants.

Case No. 2:24-cv-01441-RSL

STIPULATED MOTION TO HOLD CASE IN ABEYANCE AND ORDER

Plaintiff and Defendants, by and through their counsel of record, pursuant to Federal Rule of Civil Procedure 6 and Local Rules 7(d)(1), 10(g) and 16, hereby jointly stipulate and move to continue to stay these proceedings until May 14, 2025. Plaintiff brought this litigation pursuant to the Administrative Procedure Act and Mandamus Act, inter alia, to compel U.S. Citizenship and Immigration Services ("USCIS") to adjudicate his Form I-918 and Form I-765. This case is currently stayed through January 17, 2025. Dkt. No. 8. The parties are currently working towards a resolution to this litigation. For good cause, the parties request that the Court continue to hold the case in abeyance until May 14, 2025.

Courts have "broad discretion" to stay proceedings. Clinton v. Jones, 520 U.S. 681, 706 (1997). "[T]he power to stay proceedings is incidental to the power inherent in every court to STIPULATED MOTION FOR ABEYANCE UNITED STATES ATTORNEY

control the disposition of the causes on its docket with economy of time and effort for itself, for 1 2 counsel, and for litigants." Landis v. N. Am. Co., 299 U.S. 248, 254 (1936); see also Fed. R. Civ. P. 1. 3 4 With additional time, this case may be resolved without the need of further judicial 5 intervention. USCIS has issued a Request for Evidence ("RFE") that is necessary to adjudicate Plaintiff's applications. Plaintiff's response to the RFE is due on April 14, 2025. Once USCIS 6 7 receives the RFE response, it will need time to review the information provided. As additional time is necessary for this to occur, the parties request that the Court hold the case in abeyance 8 9 until May 14, 2025. The parties will submit a status update on or before May 14, 2025. 10 DATED this 16th day of January, 2025. Respectfully submitted, 11 12 TESSA M. GORMAN GLOBAL LAW ADVOCATES, PLLC United States Attorney 13 s/Michelle R. Lambert s/Inna Scott MICHELLE R. LAMBERT, NYS #4666657 INNA SCOTT, WSBA #46864 14 Assistant United States Attorney Global Law Advocates, PLLC United States Attorney's Office 655 South Orcas Street, Ste. 210 15 Western District of Washington Seattle, Washington 98108 1201 Pacific Avenue, Suite 700 Phone: 206-774-8758 16 Tacoma, Washington 98402 Email: iscott@globallawadvocates.com Phone: (253) 428-3824 Attorneys for Plaintiff 17 Fax: (253) 428-3826 Email: michelle.lambert@usdoj.gov 18 Attorneys for Defendants 19 20 I certify that this memorandum contains 276 words, in compliance with the Local Civil Rules. 21 22 23

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ORDER The case is held in abeyance until May 14, 2025. The parties shall submit a status update on or before May 14, 2025. It is so **ORDERED**. Dated this 16th day of January, 2025. MMS (asuik Robert S. Lasnik United States District Judge